MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ RICHARD F. ALBERT ROBERT J. ANELLO* KATHLEEN E. CASSIDY BENJAMIN S. FISCHER CATHERINE M. FOTI CHRISTOPHER B. HARWOOD LAWRENCE IASON BRIAN A. JACOBS TELEMACHUS P. KASULIS KAREN R. KING ROBERT M. RADICK* JONATHAN S. SACK** EDWARD M. SPIRO JEREMY H. TEMKIN RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

(212) 880-9555 tkasulis@maglaw.com

March 3, 2021

SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
BRENT M. TUNIS
ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG

JOHN J. TIGUE, JR. 1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.

**ALSO ADMITTED IN CONNECTICUT

By ECF

The Hon. Nicholas G. Garaufis United States District Judge United States Courthouse 225 Cadman Plaza East, Room 1426 S Brooklyn, New York 11201

Re: <u>United States v. Jason Kurland</u>,

20 Cr. 306 (NGG)

Dear Judge Garaufis:

We represent Jason Kurland in the above-captioned matter. We write with the consent of the Government to respectfully request that the Court approve the removal of one of Mr. Kurland's three sureties, Dr. Scott Blyer, from Mr. Kurland's appearance bond.

We have consulted with Mr. Kurland's other sureties, Lauren Blyer-Kurland and Anastasia Blyer, and they are comfortable remaining on Mr. Kurland's bond after the removal of Dr. Blyer. Mr. Kurland's release will continue to be secured by both real properties initially pledged.

In the six months since his arrest on August 18, 2020, Mr. Kurland has complied with his bail conditions in all respects. We have consulted with the Government, which agrees in light of Mr. Kurland's successful supervision that Dr. Blyer may be removed from the bond without any additional modification to the conditions of Mr. Kurland's release.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

Honorable Nicholas G. Garaufis March 3, 2021 Page 2

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Telemachus P. Kasulis Telemachus P. Kasulis A. Dennis Dillon

Counsel to Jason Kurland

cc: Assistant United States Attorney Lindsay K. Gerdes (by ECF and email)
Assistant United States Attorney Andrey Spektor (by ECF and email)